

94-102

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FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

February 3, 2003

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: **Dobson Cellular Systems, Inc. E911 Quarterly Report –**  
**CC Docket No. 94-102**

Dear Ms. Dortch:

Dobson Cellular Systems, Inc. and its subsidiaries, by its attorneys, hereby submit the attached Quarterly Report on their progress toward and compliance with the terms and conditions of the **Order to Stay** and the Commission's E911 rules.<sup>1</sup>

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lee J. Rosen

Attachment

cc: David H. Solomon, Chief, Enforcement Bureau  
Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau  
John Ramsey, Executive Director, APCO  
Robert M. Gurss, Counsel, APCO  
Terry Peters, Executive Director, NENA  
James R. Hobson, Counsel, NENA and NASNA  
Evelyn Bailey, NASNA

<sup>1</sup> See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) ("Order to Stay").

DOBSON CELLULAR SYSTEMS, INC.  
14201 WIRELESS WAY  
OKLAHOMA CITY, OK 73134  
(405) 529-8500

E911 Status - Quarterly Report

February 3, 2003

**Summary of Report**

Pursuant to the Order to Stay,<sup>1</sup> Dobson Cellular Systems, Inc.,<sup>2</sup> as a Tier II carrier, provides in this Quarterly Report ("Report") information on all pending requests for Phase I and Phase II services received by DCS, including: the entity requesting service; the date the request was received;<sup>3</sup> and the status of the request. For Phase I requests that have been pending for over six months, DCS has also included the projected deployment date (if available), a brief description of the reasons for the delay, and steps it has taken to resolve the issues causing the delay. Detailed information regarding the requests is contained in the attached table.

**Phase I Service**

DCS has received 69 requests for Phase I services and has activated service in 62 of these jurisdictions. DCS has worked diligently with its third-party location solution vendors, TCS Corp. and Intrado, as well as the public safety community, in coordinating Phase I deployment.

**Phase II Service**

**A. Deployment Preparation**

As discussed in its waiver petition, DCS is a mid-sized carrier servicing predominantly rural and suburban markets in 19 states. The company relies primarily upon a TDMA-based network of base stations and switching equipment. As a result of the lack of commercial availability of compliant handset-based Phase II location solutions for TDMA carriers, the company has taken steps to prepare to deploy a network-based solution.

DCS's network consists of approximately 23 Mobile Switching Centers, a majority of which utilize equipment manufactured by Nortel Networks ("Nortel"), the Test utilizing some Lucent Technologies ("Lucent") TDMA network equipment. DCS has worked with these equipment vendors to prepare for Phase II deployment, as all switch upgrades necessary to supply Phase II services were completed by Lucent by August, 2002 and by Nortel by June, 2002.

In addition, DCS has executed an exclusive contract with Grayson Wireless to provide the PDE equipment necessary to deploy its Phase II network-based location solution. The vendor has contracted to provide compliant Phase II services in Erie County, PA; Genesee County, NY; Cattaraugus County, NY; Chautauqua County, NY, and Austin County, TX as discussed below. In fact, DCS hopes to deploy Phase II services to 100% of the area in Erie County, PA; Genesee County, NY; and Cattaraugus County, NY by the March 2003 deadline or

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<sup>1</sup> See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order to Stay, 17 FCC Rcd 14841 (2002) ("Order to Stay").

<sup>2</sup> The instant Report is filed on behalf of Dobson Cellular System, Inc. and its subsidiaries (collectively "DCS").

<sup>3</sup> As indicated in the table, the provided "request date" indicates the date the PSAP/requesting entity sent its request to DCS. This date may not correspond with the date the PSAP's/requesting entity's request was "valid" per Section 20.18(j) of the rules.

within 6 months of receipt of the Phase II request, and thus exceed its obligations. If the situation does not allow for deployment, however, Dobson intends to work closely with each PSAP to determine an implementation schedule so that Phase II services can commence.

### **B. Phase II Requests**

DCS has received requests for Phase II service from the following five jurisdictions: Erie County, PA; Genesee County, NY; Cattaraugus County, NY; Chautauqua County, NY; and Austin County, TX. On October 3, 2002, the company sent correspondence to the contacts for Erie, Genesee and Cattaraugus Counties, stating that it is tentatively considering each request "valid" and intends to provide Phase II services by March 1, 2003 or within six months of the PSAP's request, whichever is later. Nevertheless, to ensure that it may properly prioritize its E911-designated resources, DCS has requested each of these PSAPs to provide documentation pursuant to the Richardson criteria.<sup>5</sup> DCS has not yet received a response to its request from these PSAPs, but is proceeding in good faith and has signed a contract with Grayson to provide Phase II capabilities in Erie and Genesee while it awaits response. Furthermore, in Chautauqua County, DCS has also requested that the PSAP provide documentation pursuant to the Richardson criteria.<sup>5</sup> Finally, Austin County recently submitted their Phase II request and DCS expects to submit a similar request for documentation.

### **C. Deployment Issues**

As a Tier II provider employing a network-based Phase II solution, pursuant to the *Order to Stay*, DCS intends to provide Phase II service to 100 percent of a requesting PSAP's coverage area or population beginning March 1, 2003, or within six months, whichever is later. DCS remains committed to meeting these deployment benchmarks in response to valid PSAP requests for Phase II service.

In discussions with Grayson Wireless, however, DCS has learned that leasing and zoning issues may affect DCS' ability to meet the March 1, 2003 deployment deadline in some markets. Specifically, in order to meet the Commission's network-based accuracy requirements, Grayson Wireless has informed the company that it may need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival equipment that will be installed in individual cell sites. DCS has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

DCS is bringing this to the Commission's attention as a potential issue that may affect DCS's ability to provide compliant Phase II services by March 1, 2003. Furthermore, DCS brought similar matters to the Commission's attention in its original waiver request.<sup>6</sup> Accordingly, if necessary, DCS may avail itself of further waiver procedures to account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests?

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<sup>5</sup>Id.

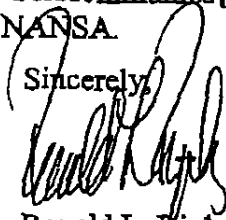
<sup>6</sup>Id.

<sup>6</sup> See Dobson Cellular Systems, Inc. Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

<sup>7</sup> See *Order to Stay* at ¶ 41.

As required by the *Order to Stay*, a copy of *this report* is being filed with the *Chief* of the Enforcement Bureau, the *Chief of the Wireless Telecommunications Bureau*, and the Executive Directors and Counsels of *APCO*, *NENA*, and *NANSA*.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald L. Ripley", written over the word "Sincerely,".

Ronald L. Ripley  
Vice President and  
Sr. Corporate Counsel

RLR:scd

**Dobson Cellular Systems, Inc.  
Wireless E9-1-1 Phase 1 & 11  
Service & "Request" Summary**

**STATUS OF PHASE I DEPLOYMENT –**

State	County	Requesting Entity Name	Request Date <sup>1</sup>	Status	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
MI	Kalkaska	Michigan Communications Director Association	04/30/01	Service activated on 4/08/02. State administrative issues.		
MI	Mason	Michigan Communications Director Association	09/01/00	Service activated on 8/19/02. PSAP was not Phase I capable at time of request.		
MI	Manistee	Michigan Communications Director Association	09/01/00	Service activated on 3/19/02. State administrative issues.		
MI	Missaukee	Michigan Communications Director Association	09/01/00	Service activated on 3/19/02. State administrative issues.		
MI	Osceola	Michigan Communications Director Association	09/01/00	Service activated on 4/25/02. State administrative issues.		
MI	Lake	Michigan Communications Director Association	09/01/00	Service activated on 4/09/02. State administrative issues.		
MI	Antrim	Antrim County Sheriff	11/11/01	DCS/XYPOINT:	DCS is ready to	02/28/03

<sup>1</sup> Indicates date PSAP sent letter to DCS requesting service; does not correspond with date PSAP's request was "valid" per Section 20.18(j) of the rules

		Office		Awaiting signaling sequences from third party provider. PSAP was not Phase I capable at time of request.	deploy.	
MI	Charlevoix	Michigan Communications Director Association	09/01/00	Service activated on 4/08/02. State administrative issues.		
MI	Leelanau	Michigan Communications Director Association	09/01/00	Service activated on 3/18/02. State administrative issues.		
MI	Wexford	Michigan Communications Director Association	09/01/00	Service activated on 3/19/02. State administrative issues.		
MI	Emmet	Michigan Communications Director Association	09/01/00	Service activated on 4/09/02. State administrative issues.		
MI	Berzie	Michigan Communications Director Association	09/01/00	Service activated on 4/09/02. State administrative issues.		
MI	Grand Traverse	Michigan Communications Director Association	09/01/00	Service activated on 3/18/02. State administrative issues.		
MI	Huron	Michigan Communications Director Association	09/01/00	Service activated on 2/15/02. State administrative issues.		
MI	Sanilac	Michigan Communications Director Association	09/01/00	Service activated on 2/22/02. State administrative issues.		
MI	Tuscola	Michigan Communications Director Association	09/01/00	Service activated on 2/13/02. State administrative issues.		

TX	Bastrop	CSEC	10/12/99	Service activated on 03/18/01. PSAP readiness and Council of Government's administrative issues,		
TX	Caldwell	CSEC	10/12/99	Service activated on 03/18/01. PSAP readiness and Council of Government's administrative issues.		
TX	Fayette	CSEC	10/12/99	Service activated on 03/18/01. PSAP readiness and Council of Government's administrative issues.		
TX	Lee	CSEC	10/12/99	Service activated on 03/18/01. PSAP readiness and Council of Government's administrative issues.		
TX	Gonzales	CSEC	10/12/99	Service activated on 01/15/01. PSAP readiness and Council of Government's administrative issues.		
TX	Jackson	CSEC	10/12/99	Service activated on 01/15/01. PSAP readiness and Council of Government's administrative issues.		
TX	Lavaca	CSEC	10/12/99	Service activated on 01/15/01. PSAP readiness and Council		

TX	Milam	CSEC	10/12/99	of Government's administrative issues. Service activated on 02/13/01. PSAP readiness and Council of Government's administrative issues.		
TX	Hamilton	CSEC	10/12/99	Service activated on 02/13/01. PSAP readiness and Council of Government's administrative issues.		
TX	Falls	CSEC	10/12/99	Service activated on 02/28/01. PSAP readiness and Council of Government's administrative issues.		
TX	Freestone	CSEC	10/12/99	Service activated on 02/28/01. PSAP readiness and Council of Government's administrative issues.		
TX	Limestone	CSEC	10/12/99	Service activated on 02/28/01. PSAP readiness and Council of Government's administrative issues.		
TX	Bosque	CSEC	10/12/99	Service activated on 02/28/01. PSAP readiness and Council of Government's administrative issues.		
TX	Hill	CSEC	10/12/99	Service activate on		



				02/28/01, PSAP readiness and Council of Government's administrative issues.		
TX	Colorado	CSEC	10/12/99	Service activated on 02/21/01. PSAP readiness and Council of Government's administrative issues,		
TX	Fort Bend	CSEC	10/12/99	Service activated on 02/21/01. PSAP readiness and Council of Government's administrative issues.		
TX	Matagorda	CSEC	10/12/99	Service activated on 02/21/01. PSAP readiness and Council of Government's administrative issues.		
TX	Wharton	CSEC	10/12/99	Service activated on 02/21/01, PSAP readiness and Council of Government's administrative issues.		
TX	Javaro	CSEC	10/12/99	Service activated on 04/15/01, PSAP readiness and Council of Government's administrative issues,		
TX	rath	CSEC	10/12/99	Service activated on 14/15/01. PSAP readiness and Council of Government's		

TX	Armstror	CSEC	10/12/99	administrative issues, Service activated on 02/23/01. PSAP readiness and Council of Government's administrative issues,		
TX	Carson	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Government's administrative issues.		
TX	Collingsworth	CSEC	10112199	Service activated on 02/23/01. PSAP readiness and Council of Government's administrative issues.		
TX	Donely	CSEC	10112199	Service activated on 02/23/01. PSAP readiness and Council of Government's administrative issues.		
TX	Gray	CSEC	10112199	Service activated on 02/23/01. PSAP readiness and Council of Government's administrative issues.		
TX	Hansford	CSEC	0112199	Service activated on 02/23/01. PSAP readiness and Council of Government's administrative issues.		
TX	Hemphill	CSEC	0112199	Service activated on 02/23/01. PSAP		

				readiness and Council of Government's administrative issues.		
TX	Hutchinson	CSEC	10112199	Service activated on 02/23/01. PSAP readiness and Council of Government's administrative issues.		
TX	Lipscomb	CSEC	10112199	Service activated on 02123101. PSAP readiness and Council of Government's administrative issues,		
TX	Ochiltree	CSEC	10/12199	Service activated on 02/23/01. PSAP readiness and Council of Government's administrative issues.		
TX	Roberts	CSEC	10/12/99	Service activated on 02/23/01. PSAP readiness and Council of Government's administrative issues,		
TX	Wheeler	CSEC	0112199	Service activated on 02/23/01. PSAP readiness and Council of Government's administrative issues.		
TX	Robertson	CSEC	01/12/99	Service activated on 04/15/01. PSAP readiness and Council of Government's administrative issues.		

TX	Burleson	CSEC	10112199	Service activated on 04/15/01. <b>PSAP</b> readiness and Council of Government's administrative issues.		
TX	Leon	CSEC	10/12/99	Service activated on 04/15/01. <b>PSAP</b> readiness and Council of Government's administrative issues.		
TX	Washington	CSEC	10112199	Service activated on 04115101. <b>PSAP</b> readiness and Council of Government's administrative issues,		
TX	Anderson	CSEC	10/12/99	<ul style="list-style-type: none"> <li>• At time of <b>request</b>, <b>PSAP</b> was not connected to S/R. Athens SIR connection and turn up was completed in September 2002.</li> <li>- Translation <b>problems</b> at the switch resulted in interim delay.</li> <li>• Service since activated on 1/10/03.</li> </ul>		
X	/an Zandt	CSEC	0/12/99	<ul style="list-style-type: none"> <li>• At time of request, <b>PSAP</b> was not connected to S/R. Athens S/R connection and turn <b>up</b> was</li> </ul>		

				completed in September, 2002. - Translation problems at the switch resulted in interim delay, - Service since activated on 1/10/03		
TX	Coleman	CSEC	10/12/99	Service activated on 03/08/01. PSAP readiness and Council of Government's administrative issues.		
TX	Brownwood	CSEC	0/12/99	Service activated on 33/08/01. PSAP readiness and Council of Government's administrative issues.		
TX	Comanche	CSEC	0/12/99	Service activated on 13/08/01. PSAP readiness and Council of Government's administrative issues.		
TX	tunnels	CSEC	0/12/99	Service activated on 13/08/01. PSAP readiness and Council of Government's administrative issues.		
TX	astland	CSEC	0/12/99	Service activated on 2/21/01, PSAP readiness and Council of Government's administrative issues.		

TX	Austin	Austin County Emergency Communications District	1/14/02	Delays in completion of trunking upgrades by LEC. Trunks are now in and testing is to begin in February 2003.		02/15/03
OK	Cherokee	Cherokee County	3/14/02	PSAP/LEC and DCS: Administrative delays relating to PANI issues. DCS sent letter (dated 12/23/02) to county stating that DCS will deploy 120 days after PSAP provides documentation that cost recovery issues with LEC have been resolved.	DCS is willing to supply PANI's to PSAP.	TBD – awaiting PSAP reply
MD	Talbot	Talbot County	8/07/02	LEC: <del>Trunks</del> were due 11/20/02 from LEC. <b>Trunks</b> are now in and testing to begin in <b>February 2003.</b>	√/A	1/07/03
PA	Erie	Erie County Emergency Management Agency	04/12/01	Service activated on 2/06/02.		
PA	Crawford	Crawford County	3/26/02	Call testing to begin first week November. 2002. Delay in	DCS is ready to deploy. Third party provider loading	12/15/03

				receiving trunks from LEC; trunks are in a testing to begin in February 2003.	PANI's in databa	
NY	Allegany	Allegany County	7/18/02	Delay in receiving <b>trunks</b> from LEC. Trunks are now in a testing to begin in February 2003.	N/A	02/28/03
NY	Cattaraugus	Cattaraugus County Sheriff Office	05/22/01	PSAP cost recovery issues; LEC delay in issuing trunks.  Service activated on 8/06/02.		
NY	Chautauqua	Office of the Sheriff	06/01/01	Service activated on 5/17/02. PSAP cost recovery issue.		
NY	Genesee	Office of the Sheriff	04/10/01	Working on test call issues. LEC delays in issuing <b>trunks</b> .  Service activated on 11/21/02.	Conference calls with LEC and carrier to discuss issues with <b>trunking</b> .	
TX	Henderson	Henderson County Communications District	01/09/03	Awaiting <b>network</b> recommendation from third party provider.	N/A	17/09/03

STATUS OF RESPONSE TO PHASE II INQUIRIES/REQUEST-

State	County	Requesting Entity Name	Request Date	Status	Steps Taken to Resolve Deployment Problems for Requests Pending Over Six Months	Expected Deployment Date
PA	Erie	Erie County Emergency Response Management Agency - Erie County E911 Center	4/12/2001*	<ul style="list-style-type: none"> <li>- DOL ded by lett (4/23/2001), requesting verification of capabilities and cost recovery mechanism.</li> <li>- Erie County did not respond.</li> <li>- Dobson sent letter 10/3/02 notifying County that it is tentatively considering request to be "valid" and plans to deliver Phase II services by 3/1/03, but also is requesting documentation pursuant to <b>Richardson</b>.</li> <li>- DCS has not received a response from county but intends to tentatively treat request as "valid" pending PSAP's provision of <b>Richardson</b> documentation.</li> <li>- Dobson has signed contract with Grayson on 12/13/02.</li> </ul>		DCS intends to deploy Phase II in county, but will not be able to meet the 3/1/03 deadline for Tier II carriers. DCS is involved in ongoing discussions with PSAP to determine alternative dare.
NY	Genesee	Office of Sheriff, Genesee County, New York	(4/10/2001)* 3/5/2002 (received	<ul style="list-style-type: none"> <li>- Dobson responded by letter, (dated 4/17/2001), requesting verification of capabilities and</li> </ul>		DCS intends to deploy Phase II in county, but will



			9/9/02)	<p>cost recovery mechanism.</p> <ul style="list-style-type: none"> <li>- Genesee County replied by letter, (dated 7/27/2001), stating that PSAP has been upgraded to receive Phase I (via CAS); no statement as to Phase II readiness.</li> <li>- County sent "official" Phase II request 9/5/02 (received 9/9/02), indicating Phase I compliant utilizing NCAS solution.</li> <li>- Dobson sent letter 10/3/02 notifying County that it is tentatively considering request to be "valid" and plans to deliver Phase II services by 3/9/03, but also is requesting documentation pursuant to <i>Richardson</i>.</li> <li>- DCS has not received a response from the county but intends to tentatively treat request as "valid" pending PSAP's provision of <i>Richardson</i> documentation.</li> <li>- Dobson has signed contract with Grayson on 12/13/02.</li> </ul>		<p>not be able to meet the <b>3/1/03</b> deadline for Tier II carriers. DCS is involved in ongoing discussions with PSAP to determine alternative date</p>
Y	Cattaraugus	Cattaraugus County Sheriff	10/5/02*	<p>Dobson responded by letter, (dated 8/31/02) requesting verification of capabilities and cost recovery mechanism.</p> <p>Cattaraugus County replied</p>		<p>DCS intends to deploy Phase II in county, but will not be able to meet the 3/1/03 deadline for Tier</p>

				<p>by email that they are capable of receiving Phase II calls.</p> <ul style="list-style-type: none"> <li>- Dobson sent letter 10/3/02 notifying County that it is tentatively considering request to be “valid” and plans to deliver Phase II services by 3/1/03, but also is requesting documentation pursuant to <b>Richardson</b>.</li> <li>- Dobson has not received a response from the County but intends to tentatively treat request as “valid” pending PSAP’s provision of <b>Richardson</b> documentation.</li> </ul>		<p>II carriers. DCS is involved in ongoing discussions with PSAP to determine alternative <b>date</b>.</p>
NY	Chautauqua	Office of the Sheriff	12/13/02	<p>Dobson responded by letter (dated 1/9/03) requesting verification of capabilities and cost recovery mechanism pursuant to <b>Richardson</b>.</p> <ul style="list-style-type: none"> <li>- Dobson has not received a response from the County.</li> </ul>	N/A	<p>6/13/03 or within 6 months of <b>Richardson</b> documentation.</p>
TX	Austin	Austin County Emergency Communications	01/28/03	<p>Dobson will send letter to County requesting documentation pursuant to <b>Richardson</b>.</p>	N/A	<p>07/28/03</p>

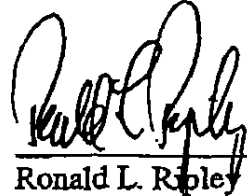
\* Contact indicated entity was “requesting” deployment both Phase I and Phase II services.

**AFFIDAVIT OF RONALD L. RIPLEY**

I, Ronald L. Ripley, do hereby **declare** *that* the **following is true and accurate:**

I **am** an officer of Dobson Cellular **Systems, Inc.** ("DCS").

I have reviewed the DCS E91 1 Phase II Quarterly Report ("**Report**") and to the best of my knowledge, information, or belief, all of *the* information contained in the Report is truthful and accurate.

A handwritten signature in black ink, appearing to read "Ronald L. Ripley", is written over a horizontal line.

Ronald L. Ripley  
Vice President &  
Senior Corporate Counsel

Executed on: Feb 3, 2003

## CERTIFICATE OF SERVICE

I, Karla Huffstickler, hereby certify that on the 3rd day of February 2003, copies of the foregoing "Quarterly Report" were sent by first class mail, postage pre-paid, or by hand delivery (\*) to the following:

David H. Solomon\*  
Chief  
Enforcement Bureau  
Federal Communications Bureau  
445 12<sup>th</sup> Street, S.W., Room 7C-485  
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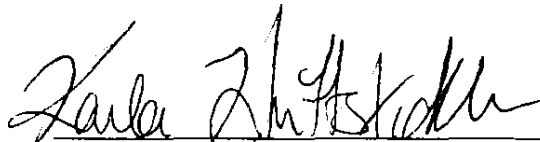
Evelyn Bailey  
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Karla Huffstickler